

# **EXHIBIT 2**

**From:** Lesley Weaver  
**Sent:** Tuesday, August 27, 2019 12:46 PM  
**To:** ibrahimhassan0013@yahoo.com; annie.sara@yahoo.com; m.hysa@yahoo.com  
**Cc:** Derek Loeser  
**Subject:** Facebook - motion to consider relation  
**Attachments:** 257 - 2019-02-22 Amended Complaint.pdf

Dear Mr. Hassan, Ms. Hassan and Ms. Hysa,

We are co-lead counsel in the multidistrict litigation ("MDL") pending against Facebook arising out of revelations following the Cambridge Analytica scandal. The MDL is a class action on behalf of all Facebook users in the U.S. and U.K. whose content and information was collected by Facebook and published and/or disclosed to third parties without users' authorization or consent; the class period is from January 1, 2007 to the present. The matter has been pending before Judge Chhabria since last year. Our most recent amended complaint is attached.

It has come to our attention that you are representing yourselves in the case *Hassan v. Facebook*, which is pending in the Northern District of California before Judge Tigar. We see that the plaintiffs filed an amended complaint on August 23, 2019. We believe that your action overlaps with the claims and legal issues presented in our action.

Under the Civil Local Rules for the Northern District of California, parties are obligated to inform the courts when actions are pending that cover substantially subject matter and legal issues. The Local Rules are available here: <https://www.cand.uscourts.gov/localrules/civil>. This is the Rule to which we are referring:

### 3-12. Related Cases

1. **(a) Definition of Related Cases.** An action is related to another when:
  1. **(1)** The actions concern substantially the same parties, property, transaction or event; and
  2. **(2)** It appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges.
2. **(b) Administrative Motion to Consider Whether Cases Should be Related.** Whenever a party knows or learns that an action, filed in or removed to this district is (or the party believes that the action may be) related to an action which is or was pending in this District as defined in Civil L.R. 3-12(a), the party must promptly file in the lowest-numbered case an Administrative Motion to Consider Whether Cases Should be Related, pursuant to Civil L.R. 7-11. In addition to complying with Civil L.R. 7-11, a copy of the motion, together with proof of service pursuant to Civil L.R. 5-5, must be served on all known parties to each apparently related action. A courtesy copy of the motion must be lodged with the assigned Judge in each apparently related case under Civil L.R. 5-1(e).
3. **(c) Sua Sponte Judicial Referral for Purpose of Determining Relationship.** Whenever a Judge believes that a case pending before that Judge is related to another case, the Judge may refer the case to the Judge assigned to the lowest-numbered case with a request that the Judge assigned to the lowest-numbered case consider whether the cases are related. The referring Judge shall file and send a copy of the referral to all parties to all affected cases. The parties must file any response in opposition to or support of relating the cases pursuant to Civil L.R. 3-12(e). Alternatively, a Judge may order the parties to file a motion pursuant to Civil L.R. 3-12(b).
4. **(d) Content of Motion.** An Administrative Motion to Consider Whether Cases Should be Related must contain:

1. **(1)** The title and case number of each apparently related case;
  2. **(2)** A brief statement of the relationship of the actions according to the criteria set forth in Civil L.R. 3-12(a).
5. **(e) Response to Motion.** Any opposition to or support of a Motion to Consider Whether Cases Should Be Related must be filed in the lowest-numbered case pursuant to Civil L.R. 7-11. The opposition or statement of support must specifically address the issues in Civil L.R. 3-12(a) and (d) and be served on all parties and lodged with the Chambers of all Judges identified in the motion. If the motion identifies more than two potentially related cases, and a party contends that not all of the cases are related, the party must address whether any of the cases are related to one another.
6. **(f) Order Granting or Denying Relationship.** Upon a motion by a party or a referral by another Judge, after the time for filing support or opposition to the Motion to Consider Whether Cases Should Be Related has passed, the Judge in this District who is assigned to the lowest-numbered case will decide if the cases are or are not related and will notify the Clerk, who, in turn, will notify the parties.
1. **(1)** Due to the need for parties and affected Judges to have a speedy determination of the motion or referral, the Judge assigned to the lowest-numbered case shall act on the motion or referral within 14 days after the date a response is due. If the Judge assigned to the lowest-numbered case is not available for that period, the Clerk or counsel may bring the motion or referral to the General Duty Judge.
  2. **(2)** If the Judge assigned to the lowest-numbered case decides that the cases are not related, no change in case assignment will be made. In cases where there are more than two potentially related cases, the Clerk shall submit the order to the Judges assigned to the other cases in order of filing with a form of order to decide within 14 days if the cases are or are not related. If no Judge relates any of the remaining cases, no change in case assignment will be made.
  3. **(3)** If any Judge decides that any of the cases are related, pursuant to the Assignment Plan, the Clerk shall reassign all related later-filed cases to that Judge and shall notify the parties and the affected Judges accordingly.
7. **(g) Effect of Order on Case Schedule.** The case management conference in any reassigned case will be rescheduled by the newly assigned Judge. The parties shall adjust the dates for the conference, disclosures and report required by Fed. R. Civ. P. 16 and 26 accordingly. Unless the assigned Judge otherwise orders, upon reassignment, any deadlines set by the ADR Local Rules remain in effect and any dates for hearing noticed motions are automatically vacated and must be renoticed by the moving party before the newly assigned Judge. For cases ordered related after the initial case management conference, unless the assigned Judge otherwise orders, any deadlines established in the case management order shall continue to govern, except for the trial date, which will be rescheduled by the assigned Judge.

Because your action concerns substantially the same parties and transactions to the claims asserted in the MDL, we believe it should be related to the MDL proceeding pursuant to Local Rule 3-12. This would relate your action to our action, which was earlier filed.

We are writing to see if you agree that the actions are related and will agree to relation. If you do not agree and would like to discuss it, we are available should you wish to do so. If we do not hear from you shortly, we will file a motion to relate and you can enter your opposition, consistent with the Local Rule above, accordingly.

Please note that we have been unable to find an email address for Kosta Hysa. We will attempt to call her but hope that you will share this email with her as well. You can respond to us by email here.

Thank you for your attention to this matter.

Regards,

Lesley

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